

Exhibit A

LaBARBIERA & MARTINEZ

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Attorney for Plaintiff(s)

ANTHONY N. MORIN,

Plaintiff(s),

v.

BINLI TRUCKING, INC., ZHAO G. JIANG,
JOHN DOES 1-10 (being fictitious persons
whose identities are currently unknown) and
ABC CO. 1-10 (being fictitious business
entities whose identities are currently
unknown),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION; HUDSON COUNTY

DOCKET NO.: HUD-L-

Civil Action

COMPLAINT

Plaintiff, ANTHONY N. MORIN, residing at 532 Garden Street, Hoboken, New Jersey, by way of complaint against the Defendants, say(s):

FIRST COUNT

1. On or about May 30, 2017, Plaintiff, ANTHONY N. MORIN, was the operator of a motor vehicle traveling on the New Jersey Turnpike ramp for exit 15X in or around Secaucus, New Jersey.
2. At the aforesaid time and place, a vehicle owned by Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown), and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown) and operated by Defendant ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown) was traveling on the New Jersey Turnpike ramp for exit 15X in or around Secaucus, New Jersey.
3. At the aforesaid time and place, the Defendant driver, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), operated his vehicle in such a careless, reckless and negligent manner in that he changed lanes and failed to observe the vehicle occupied by the Plaintiff, causing the collision between the vehicles.

4. As a result of the aforesaid collision, Plaintiff, ANTHONY N. MORIN, was caused to sustain severe and grievous personal injuries resulting in damages for which he makes this claim.

WHEREFORE, Plaintiff, ANTHONY N. MORIN, hereby demands judgment against the Defendants, jointly and severally, for damages, interest, attorney's fees and costs of suit.

SECOND COUNT

1. Plaintiff, ANTHONY N. MORIN, repeats, reiterates and re-alleges the allegations of the First Count of this Complaint as if set forth herein at length.
2. Upon information and belief and at all times herein before mentioned, the Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown) were corporations and/or companies doing business in the State of New Jersey.
3. At all times hereinafter mentioned, the Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown) were corporations and/or companies doing business in the State of New Jersey, were the owners, lessors, lessees and/or renters of a certain motor vehicle which was being operated with their permission by Defendant, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), as their agent, servant, and/or employee.
4. On or about May 30, 2017, and at all times relevant hereto, the Defendant, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), was operating the said motor vehicle of the Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown) in the service of and in the course of his employment with the Defendant, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown) and thereby at all times herein mentioned, was acting as the agent, servant and/or employee of the said Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown).
5. As a result of the negligence, carelessness and recklessness of the Defendant, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), in the operation of the aforesaid motor vehicle while in the course of his employment and in the service of the Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being

fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), severe and serious injuries and other damages were caused to the Plaintiff, ANTHONY N. MORIN.

6. As a result of the acts of negligence, carelessness and recklessness of Defendant, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), as stated above, while in the course of his employment with and in the service of the Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), said Defendants are liable to the Plaintiff for the negligent and reckless acts above stated of their agent, servant and/or employee, Defendant, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), under the doctrine of Respondeat Superior and for all personal injuries and other damages herein sustained.

WHEREFORE, Plaintiff, ANTHONY N. MORIN, hereby demands judgment against the Defendants, jointly and severally, for damages, interest, attorney's fees and costs of suit.

THIRD COUNT

1. Plaintiff, ANTHONY N. MORIN, repeats, reiterates and re-alleges the allegations of the previous Counts of this Complaint as if set forth herein at length.
2. On or about May 30, 2017, the Defendants, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), operated the previously described motor vehicle in such a careless, reckless and negligent manner, in that he changed lanes and failed to observe the vehicle occupied by the Plaintiff, causing the collision between the vehicles. Consequently, the Defendant caused the Plaintiff to sustain and suffer the injuries and other damages hereafter alleged.
3. Upon information and belief and at all times hereinafter mentioned, the Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), or any of them, through their actions and in-actions, negligently enabled the Defendant, as stated above, to obtain the use of the subject motor vehicle and were otherwise negligent in that they knew or reasonably should have known that the Defendant, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown), was an individual who had repeatedly improperly operated a motor vehicle.
4. Upon information and belief and at all times hereinafter mentioned, the Defendants, BINLI TRUCKING, INC., JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently

unknown), or any of them, acted with negligent and reckless disregard of the safety of the general public at large in enabling the Defendant, as stated above, to obtain the use of a motor vehicle, an inherently dangerous instrumentality, without investigating the driving record and/or history of the Defendant, ZHAO G. JIANG, JOHN DOES 1-10 (being fictitious persons whose identities are currently unknown) and ABC CO. 1-10 (being fictitious business entities whose identities are currently unknown).

5. As a result of the aforesaid collision, Plaintiff, ANTHONY N. MORIN, was caused to sustain severe and grievous personal injuries resulting in damages for which he makes this claim.

WHEREFORE, Plaintiff, ANTHONY N. MORIN, hereby demands judgment against the Defendants, jointly and severally, for damages, interest, attorney's fees and costs of suit.

JURY DEMAND

Plaintiff(s) demand(s) trial by jury as to all issues.

LaBARBIERA & MARTINEZ
Attorneys for Plaintiff(s)

Date: August 7, 2017

By:

Joseph LaBarbiera, Esq.

CERTIFICATION

Pursuant to R.4:5-1, the Plaintiff(s) hereby certify(ies) that the within matter of controversy is not the subject of any action pending in any other jurisdiction, nor is it the subject of any arbitration matter pending in any other jurisdiction.

LaBARBIERA & MARTINEZ
Attorneys for Plaintiff(s)

Date: August 7, 2017

By:

Joseph LaBarbiera, Esq.

DESIGNATION OF TRIAL COUNSEL

Luis A. Martinez, Esq. is hereby designated as trial counsel herein.

LaBARBIERA & MARTINEZ
Attorneys for Plaintiff(s)

Date: August 7, 2017

By:

Joseph LaBarbiera, Esq.